

Appln. No.: 09/993,513  
Amendment dated September 25, 2006  
Reply to Office Action of July 6, 2006

### REMARKS/ARGUMENTS

The Office Action of June 6, 2006, has been carefully reviewed and these remarks are responsive thereto. Claims 1-4, 6-14, 17-19, 21, 24, 25, 28, 31-33, 35, 38, and 39 have been amended, new claims 42-44 have been added, and no claims have been canceled. No new matter has been added. Claims 1-4, 6-19, 21-33, and 35-44 thus remain pending in this application. Reconsideration and allowance of the instant application are respectfully requested.

#### *Rejections Under 35 U.S.C. § 103*

Claims 1-4, 6, 8, 9, 11-19, 21, 23, 24, 26-33, 35, 37, 38, 40, and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Schroeder *et al.* (U.S. Patent No. 6,405,060, hereinafter Schroeder) in view of Balakrishnan *et al.* (U.S. Patent No. 5,952,942, hereinafter Balakrishnan). Claims 7, 10, 22, 25, 36, and 39 also stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Schroeder in view of Balakrishnan. These rejections are respectfully traversed.

In order to establish a *prima facie* case of obviousness under § 103(a), three criteria must exist: 1) there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings; 2) there must be a reasonable expectation of success; and 3) the prior art reference(s) must teach or suggest all the claim limitations. *See* MPEP § 706.02 (j); *In re Vaeck*, 947 F.2d 488 (Fed. Cir. 1991).

However, even if combined, the alleged combination would not teach or suggest all the features of any claim. For example, amended claim 1 recites, "when the candidate comprises a text string consisting of a plurality of individual words." Claim 1 also recites, "the user ... selects the entire text string by pressing the select-key for a period longer than the predetermined period of time." As stated on page 3 of the office action:

Schroeder fails to explicitly disclose wherein the user, when the candidate consisting of a text string consisting of a plurality of individual words, selects the first candidate word in the text string by pressing a select-key for a period shorter than a predetermined period of time, and the entire text string by pressing the select-key for a period longer than a predetermined period of time. (Emphasis in office action)

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To clarify, Applicants agree with the Examiner that Schroeder does not disclose pressing a select key for shorter or longer than a predetermined amount of time. Further, Applicants note that Schroeder also fails to teach or suggest "when the candidate comprises a text string consisting of a plurality of individual words," as recited in claim 1. That is, in Schroeder, every candidate in the word completion directory consists of a single word only.

In addressing these deficiencies of Schroeder, the office action alleges that Balakrishnan teaches a candidate comprising a text string consisting of a plurality of individual words at col. 7, lines 31-42 (i.e., two-word combination model). Applicants disagree with this characterization. Balakrishnan states, at col. 7 lines 34-38, "a bigram language model ... is used to determine the frequency of two consecutive words occurring together and to rank order the candidate matches accordingly." Thus, Balakrishnan's "two-word combination model" does not involve a completion candidate with a plurality of words, but is rather a technique for placing the most likely single-word completion candidates at the top of the selection list. Balakrishnan further describes at col. 3, line 59 to col. 4, line 7, that the language model data 34, and not the dictionary 33, would include the bigram data. Thus, like Schroeder, Balakrishnan fails to teach or suggest a "when the candidate comprises a text string consisting of a plurality of individual words," as recited in claim 1.

The office action also alleges that Balakrishnan teaches pressing a key for less than a predetermined period of time in order to select a candidate word at col. 7, lines 13-16. However, while Balakrishnan does distinguish between a key press and a press-and-hold, it does not disclose, "wherein the user ... selects the entire text string by pressing the select-key for a period longer than the predetermined period of time," as recited in claim 1. Specifically, Balakrishnan states at col. 6, line 65 to col. 7, line 11:

If at any time in mode 40 (except between steps 184 and 195) the desired word to be entered in the text display area 15 is not the highest priority word, key 19 can be pressed down and held down for a predetermined time (e.g. 1.5 seconds) and this will cause cycle mode 44 (FIG. 3) to operate and the candidate matches in display area 17 will cycle through (cycling to the left if more than one is displayed). Upon release of the respective button, standard entry mode 40 resumes. Pressing-and-holding of key 19 between steps 184 and 195 can be given a different meaning (because pressing and releasing that key at that time already operates the

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function of cycling through the choices). It is preferred that here pressing-and-holding key 19 has the effect of entering a space in text display area 15. (Emphasis added)

Thus, Balakrishnan discloses using a press-and-hold for cycling through word completion candidates, or for entering a space character, but does not teach or suggest using a press-and-hold for selecting the entire text string. As discussed above, Balakrishnan does not even disclose completion candidates comprising multiple words. It is therefore not surprising that Balakrishnan fails to teach or suggest, "wherein the user ... selects the entire text string by pressing the select-key for a period longer than the predetermined period of time," as recited in claim 1.

For the reasons stated above, Applicants submit that claim 1 is not obvious over the alleged combination of Schroeder and Balakrishnan. Claims 2-4 and 6-13 depend from claim 1, and are therefore not obvious for the same reasons, as well as based on the additional features recited therein.

Independent claim 14 recites a character entry application comprising means for performing steps similar to those recited in claim 1, and is therefore not obvious over Schroeder and Balakrishnan for similar reasons as those stated above. Claims 15-19 and 21-27 depend from claim 14, and are therefore not obvious for the same reasons, as well as based on the additional features recited therein.

Independent claim 28 recites a mobile terminal comprising means for performing steps similar to those recited in claim 1, and is therefore not obvious over Schroeder and Balakrishnan for similar reasons as those stated above. Claims 29-33 and 35-41 depend from claim 28, and are therefore not obvious for the same reasons, as well as based on the additional features recited therein.

### ***Nonstatutory Double Patenting***

Claims 1-4, 6-19, 21-33, and 35-41 are provisionally rejected under the judicially-created doctrine of obviousness-type double patenting based on claims 1 and 4-9 of co-pending application 09/921,127. Applicants respectfully traverse. None of the claims in application 09/921,127 recite or suggest either a "multi-word completion candidate," or "wherein if the user

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selects ... by pressing a select-key for a period longer than a predetermined period of time, then the entire multi-word completion candidate is added to the input text string," as recited in independent claims 1, 14, and 28 of the instant application. Accordingly, Applicants respectfully request withdrawal of this provisional rejection.

### *New Claims*

Applicants have added new claims 42-44 to clarify and more fully claim their invention. For example, claim 42 recites, in part, "wherein at least one of the word completion candidates comprises a multi-word text string," and "wherein if the user selects the matching multi-word completion candidate by pressing the select key for a period longer than a predetermined period of time, then the entire multi-word completion candidate is added to the input text string displayed on the communication terminal." Claims 43 and 44, respectively reciting a computer readable media and a mobile communication terminal, include similar steps to those recited in claim 42. Thus, for the reasons discussed above in relation to claim 1, new claims 42-44 are allowable over the cited references.

(Conclusion and signature block follow on next page)

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**CONCLUSION**

All rejections having been addressed, applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the Examiner is requested to contact the undersigned at (202) 824-3153.

Respectfully submitted,

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Dated this 25 day of Sept., 2006

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